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VOLUME III DRAFT CLOSURE CERTIFICATION REPORT, CASTLE AIR FORCE BASE, MERCED COUNTY

We have reviewed the *Draft Closure Certification Report, Volume III*, dated April 1997. The Report was submitted to us on 12 May 1997 and was prepared for the Air Force by Laguna Construction Company. The Report provides a good overview of field investigations associated with these sites and is an overall improvement over the Volume I and II Closure Reports. Sampling protocols and excavation activities are well documented. Also, data presentation from previous investigations and pipeline conditions, with the exception of a few sites (discussed below), were also better documented. However, in several cases the Report included sites which, according to the Air Force, still require further investigation and/or remediation. These sites should not have been included in the Report. We concur that the information provided in the report for the following sites is adequate to show water quality is protected:

Facility 443, Facility 785, Facility 1182, Facility 1231, Facility 1253, Facility 1317, Facility 1320, Facility 1322, Facility 1325, Facility 1332, Facility 1340, Facility 1344, Facility 1350, Facility 1530, Facility 1532, Facility 1552, Facility 1750, Facility 1762, Facility 1868.

The following sites (Facility 65, Facility 360, Facility 502, Facility 752, Facility 871, Facility 1260, Facility 1315, Facility 1319, Facility 1324 and Facility 59) require additional field investigations or better documentation as discussed below.

Further Investigation Sites

The Air Force stated that Facilities 65 and 59 still require further investigation and remediation. These sites should be included for our review into a future closure certification report after additional remedial efforts and confirmation sampling is performed..

Facility 360, Facility 752. Facility 1210 and Facility 871

The product lines for Facility 360 (20,000 gallon UST), Facility 752 and, Facility 1210 (Tank 3) were approximately 35 feet, 28 feet and 33 feet long, respectively. The Air Force should perform additional

sampling to verify that the product lines did not leak any contaminants or the Air Force should describe why soil sampling was not necessary in these areas.

The Air Force performed sampling of the product pipelines at Facility 871. However, the Air Force should also report the condition of the pipelines, providing the rationale for these sample locations (i.e. joints, cracks, etc.).

Facility 502

Information (recommendations, page 5-11) provided for this site suggests that the southeast corner of the excavation base is still contaminated but that this area and will be addressed by remedial activities conducted by Lawrence Livermore Laboratories. The Air Force should provide all field data, collected by the Lawrence Livermore remedial activities which is pertinent for describing the vertical and lateral extent of contamination associated with Facility 502. Field data provided should include site location maps, boring logs, and soil and groundwater analytical results.

Facility 1260

Contamination detected on the south side of Building 1260 is reportedly associated with buildings B54 and ST 55 and an oil water separator south of Building 1260 The Report should include all boring logs, analytical results (groundwater and soil) and site location maps showing monitoring well or soil sample locations that are in proximity to Facility 1260. All pertinent field data should be incorporated into the Report.

Facility 1315

Soil excavation was performed in two stages for this site. However, the site location maps do not show the sample location or extent of the second stage of excavation Also, the analytical sampling summary table shows that the sample results were rejected. The Air Force should provide additional confirmation sampling at this site or provide clarification on the location of the excavation and the soil analytical sample results.

Facility 1319

The Report should include all field data (boring logs, analytical data, site maps etc.) and report all previous investigations associated with this site.

Facility 1324

Investigations conducted during the excavation reported that the highest PID readings were detected in the central and north central area of the excavation (700 to 807 ppm). However, the sample locations for the investigative dig area were limited to the north and south end of the excavation. The Air Force should provide a site map showing the location of PID readings measured at the base of the excavation.

Information provided in the Report should justify that an adequate number of sample locations and soil samples were provided to verify that residual contamination will not impact water quality.

If you have any questions or comments, please call either Robert Reeves, who reviewed this report, at (916) 255-3050, or myself at (916) 255-3066.

JOHN RUSSELL

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